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VIA ECF

The Honorable Analisa Torres
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: In re Application of Forensic News LLC and Scott Stedman for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in a Foreign Proceeding, Case No. 22-mc-347-AT

Dear Judge Torres:

We represent Walter Soriano (“Mr. Soriano”) who seeks to intervene in the above-referenced proceeding and oppose the application (the “Application”) of Forensic News LLC and Scott Stedman (“Petitioners”) for an order pursuant to 28 U.S.C. § 1782 to conduct discovery for use in a foreign proceeding. Mr. Soriano is the claimant in the foreign proceeding, pending in the High Court of Justice in England (the “High Court”), for which Petitioners seek discovery by their Application.

Pursuant to Your Honor’s Individual Practices, Section III.A, we submit this letter to provide notice of Mr. Soriano’s intention to file a motion to intervene, opposition to petitioner’s application pursuant to 28 U.S.C. § 1782, and, in the alternative, motion to stay (the “Motion”). We intend to file the Motion this afternoon to comply with the deadline set by Your Honor for respondent to oppose the Application [ECF No. 11] because, as set forth in the Motion, respondent has indicated that it will not oppose the Application.

As is set forth more fully in the Motion: (1) Mr. Soriano, as the party against whom the requested information will be used, has standing to challenge the issuance of the § 1782 subpoenas and otherwise satisfies the requirements for intervention as of right under Federal Rule of Civil Procedure 24(a); (2) the Application should be denied as unduly burdensome and an end-run around the limitations on foreign proof gathering imposed by the High Court; and (3) in the alternative, the Court should stay determination of the Application pending the High Court’s determination of Mr. Soriano’s anti-suit injunction application, filed promptly upon Mr. Soriano’s discovery of the Application, which asks the High Court to order Petitioners to withdraw the Application before this Court.

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Jessica N. Meyers